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U.S. Department of Justice



United States Attorney
Eastern District of New York

MKP
F. #2017R01840

271 Cadman Plaza East
Brooklyn, New York 11201

April 2, 2019

By ECF

The Honorable Nicholas G. Garaufis
United States District Judge
United States District Court
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Keith Raniere, et al.
Criminal Docket No. 18-204 (NGG)

Dear Judge Garaufis:

The government respectfully submits this letter attaching the government's proposed juror questionnaire, which is largely agreed-upon by the parties. The parties will confer on Exhibit A and submit that to the Court no later than tomorrow. The government respectfully requests permission to provide the Court with proposed Exhibit A under seal because it will contain the name of victims and others who have not been publicly identified.

The parties also jointly request that the Court issue an order preventing public release of prospective jurors and empaneled jurors' names until after trial and requiring that jurors be identified only by juror number in open court. See United v. Shkreli, 15-CR-637

(KAM), Memorandum and Order, dated June 25, 2017, (Dkt. No. 259), at 16. The parties may also request additional precautions be taken to protect jurors' identities until after trial.

Respectfully submitted,

RICHARD P. DONOGHUE
United States Attorney

By: /s/
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Tanya Hajjar
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cc: Clerk of Court (NGG) (by ECF)
Counsel of Record (by ECF)

Application granted to submit
proposed Exhibit A under seal
is granted. To order.

s/Nicholas G. Garaufis

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